

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

**TO: Seth A. Goldberg, Esq,  
DUANE MORRIS LLP  
30 South 17th Street  
Philadelphia, Pennsylvania 19103**  
*Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc.,  
Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Mi (Karen) Xu, Senior Director of Market Development at Zhejiang Huahai Pharmaceutical Co., Ltd., on April 20 through April 22, 2021, at 7:00 a.m. Hong Kong time (April 19 through April 21, 2021, at 7 p.m. eastern time), and continuing until completion, at Duane Morris LLP, 30 South 17th Street, Philadelphia, Pennsylvania 19103, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will be provided.

**TAKING ATTORNEY FOR PLAINTIFFS:**

LAYNE HILTON, ESQ.  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
Telephone: (504) 524-5777  
Fax: (504) 524-5763  
l.hilton@kanner-law.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 15, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Adam M. Slater  
ADAM M. SLATER  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Roseland, NJ 07068  
Telephone: 973-228-9898  
Fax: 973-228-0303  
[aslater@mazieslater.com](mailto:aslater@mazieslater.com)

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Mi (Karen) Xu.
2. The complete production of Mi (Karen) Xu's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater  
ADAM M. SLATER  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Roseland, NJ 07068  
Telephone: 973-228-9898  
Fax: 973-228-0303  
aslater@mazieslater.com